

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

**MOTION TO SET IN-PERSON EXPEDITED HEARING ON (I) MOTION TO HOLD
ASTRID E. GABBE IN CONTEMPT FOR VIOLATION OF THE CONFIRMED PLAN
AND THE AUTOMATIC STAY AND ENJOIN FURTHER CONDUCT, AND FOR
RELATED RELIEF AND (II) THE LIQUIDATING TRUSTEE’S CLAIM OBJECTIONS
TO CLAIMS NOS. 57 AND 110.**

COMES NOW Thomas T. McClendon, as Liquidating Trustee for the Galardi Creditor Trust (“Liquidating Trustee”), and hereby files this “*Motion to Set In-person Expedited Hearing on (i) Motion to Hold Astrid E. Gabbe in Contempt for Violation of the Confirmed Plan and the Automatic Stay and Enjoin Further Conduct, and for Related Relief and (ii) the Liquidating Trustee’s Claim Objections to Claims Nos. 57 and 110*” (the “Motion”). In support of the Motion, Movant shows as follows:

1. On October 11, 2023, the Liquidating Trustee filed the *Motion to Hold Astrid E. Gabbe in Contempt for Violation of the Confirmed Plan and the Automatic Stay and Enjoin Further Conduct*. (Doc. No. 604) seeking an order from the Court holding Astrid E. Gabbe in contempt for violation of the confirmed plan and the automatic stay. The Court may grant an expedited hearing for good cause.

2. The Liquidating Trustee further requests that the Court set the Liquidating Trustee’s objections to Claims No. 57 and 110 (Dkt. No. 428 and 512) for such hearing.

3. In light of Ms. Gabbe's continued filings, including the pending motion for judgment against Ms. Long¹, the Liquidating Trustee requests that the Court set such hearing for the earliest time the Court otherwise has available that gives the parties time to make arrangements to appear in person.²

4. Because of the numerous facts and cross-allegations of fraud, including (i) fraud by appearing by phone on behalf of other individuals under their name and (ii) fraud in indicating consent by other parties when the other party appears to dispute such consent, the Liquidating Trustee requests that the Court require Astrid Gabbe, Chris Kosachuk, Joseph Gurnsey dba Red Shield Funding, and Alexis King appear in person at such hearing. A more detailed description of the above allegation is contained in the Motion, which is incorporated herein by reference.

WHEREFORE, the Liquidating Trustee respectfully requests that this Court shorten any applicable notice period, schedule an expedited hearing on the Motion and Claim Objections at the earliest opportunity, grant the relief requested in the Motion, and grant such other relief as may be just and proper.

Respectfully submitted this 11th day of October, 2023.

JONES & WALDEN, LLC

/s/ Thomas T. McClendon

Thomas T. McClendon,

Georgia Bar No. 431452

699 Piedmont Avenue, NE,

Atlanta, Georgia 30308

(404) 564-9300

tmcclendon@joneswalden.com

Liquidating Trustee for the Galardi Creditor Trust

¹ Responses to such motion are due October 20, 2023.

² The Liquidating Trustee will be traveling for another case on October 19th and 20th, 2023 and respectfully requests that these hearings not be set on those dates.

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CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING

1. I hereby certify, as a member of the Bar of this Court, that I carefully examined this matter and that there is a true necessity for an emergency hearing.

2. I certify further that the necessity for this emergency hearing has not been caused by any lack of due diligence on my part but has been brought about only by the circumstances of this case.

3. I certify further that I have made a bona fide effort to resolve this matter without hearing.

Respectfully submitted this 11th day of October, 2023.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

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Georgia Bar No. 431452
699 Piedmont Ave. NE
Atlanta, Georgia 30308
(404) 564-9300

tmccclendon@joneswalden.com

Liquidating Trustee for the Galardi Creditor Trust

**IN THE UNITED STATES BANKRUPTCY COURT
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MACON DIVISION**

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the date indicated below, the foregoing *Motion* was filed using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and accompanying link to the Notice to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Michael Akemon** mutepe.akemon@richardslegal.com
- **Ainsworth G Dudley** adudleylaw@gmail.com
- **Evan Owens Durkovic** ecfgamb@aldridgepite.com, edurkovic@ecf.courtdrive.com
- **Robert G. Fenimore** robert.g.fenimore@usdoj.gov, Ustp.region21.mc.ecf@usdoj.gov
- **Will Bussell Geer** wgeer@rlkglaw.com,
notices@nextchapterbk.com;willgeer@ecf.courtdrive.com;2836@notices.nextchapterbk.com;6717577420@filings.docketbird.com;geer.willb117921@notify.bestcase.com;emiller@rlkglaw.com
- **Whitney Warnke Groff** whitney.groff@cobbcounty.org
- **Elizabeth A. Hardy** elizabeth.a.hardy@usdoj.gov,
Ustp.region21.mc.ecf@usdoj.gov;elizabeth.hardy.collins@usdoj.gov
- **Brian K. Jordan** ecfgamb@aldridgepite.com, bjordan@ecf.courtdrive.com
- **Christina T. Lanier** christina.t.lanier@usdoj.gov, southern.taxcivil@usdoj.gov
- **Jonathan Loegel** jonathan@loegel.com
- **Roy E. Manoll** kdd@fbglaw.com
- **Louis G. McBryan** lmc Bryan@mcbryanlaw.com, alepage@mcbryanlaw.com
- **Garrett A. Nail** gnail@pgnlaw.com
- **Jason M. Orenstein** jmopclaw@yahoo.com
- **James D. Silver** jsilver@kklaw.com, raldama@kklaw.com
- **Christopher W. Terry** chris@boyerterry.com, terryer40028@notify.bestcase.com
- **U.S. Trustee - MAC** Ustp.region21.mc.ecf@usdoj.gov

This 11th day of October, 2023.

JONES & WALDEN, LLC

/s/ Thomas T. McClendon

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Georgia Bar No. 431452

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Atlanta, Georgia 30308

(404) 564-9300

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Liquidating Trustee for the Galardi Creditor Trust